

Jorgenson, Craig

From: Lozano, VelRey
Sent: Tuesday, September 03, 2013 10:57 AM
To: Kent, Bruce; Jorgenson, Craig
Subject: FW: Public Comment on Wind River Reservation Pollution Discharge Permits

FYI, sent to the wrong docket number, but within the PN date.

VL

From: Fulton, Abby
Sent: Tuesday, September 03, 2013 10:00 AM
To: Lozano, VelRey
Subject: FW: Public Comment on Wind River Reservation Pollution Discharge Permits

VelRey,
Please see my message below and let me know what you would like me to do with this comment.
Thank you.

Abby L. Fulton
Air Quality Planning Unit
U.S. EPA, Region 8
(303) 312-6563

From: Fulton, Abby
Sent: Tuesday, September 03, 2013 9:53 AM
To: Rathbone, Colleen
Subject: Public Comment on Wind River Reservation Pollution Discharge Permits

Colleen,
The following comment was submitted, I believe mistakenly, to one of our air dockets (EPA-R08-OAR-2012-0026-DRAFT-0118). Is there a different docket you would like me to move this to? Please let me know.
Thank you.

Abby L. Fulton
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Ms. Colleen Rathbone (8P-W-WW)
U.S. Environmental Protection Agency, Region 8 1595 Wynkoop Street
Denver, CO 80202-1129

RE: Comments on Wind River Reservation Pollution Discharge Permits Dear Ms. Rathbone:

As a concerned citizen I echo the comments made by the Public Employees for Environmental Responsibility (PEER) and I am submitting these comments on the following proposed permits and their statements of basis:

Eagle Oil and Gas Company - Sheldon Dome Facility; NPDES Permit No. WY-0020338;
Phoenix Production Company - Sheldon Dome Field; NPDES Permit No. WY-002495;
Phoenix Production Company - Rolff Lake Unit; NPDES Permit No. WY-0024945;
WESCO Operating, Inc. - Sheldon Dome Field; NPDES Permit No. WY-0025607; and
WESCO Operating, Inc. - Tensleep #1 (also known as Winkleman Dome); NPDES Permit No. WY-0025232

In summary, these proposed permits are drafted in a manner that is not compliant with U.S. Environmental Protection Agency (EPA) requirements; they are incomplete and do not address an array of effluents which will be discharged. In addition, the permits put wildlife and livestock which drink the produced water at risk. Finally, the monitoring requirements proposed in these permits are impermissibly lax.

For these reasons I echo the key concerns enumerated below cited by PEER in an early comment and I urge that the proposed permits be rejected.

I. Many Toxic Chemicals Not Listed in Permit.
Permits Lack Limits for Discharge of Toxic Chemicals
The Effects on Wildlife and Livestock are Undisclosed
The Permits Lack Adequate Monitoring Standards
Permits do Not Meet EPA Standards
EPA Permits Are Less Stringent than Wyoming Standards

As a citizen I am deeply concerned that a government agency entrusted with protecting our country's environment should show such disregard for the safety and health of animal and human life. The permits do not serve their intended purpose of protecting water quality and human and animal health. A number of changes are needed to make these permits minimally passable:

1. The permits should require the disclosure of all chemical programs occurring at the facility, including well maintenance, acid stimulation, and fracking. These disclosures should include the products and chemicals used during the stated events, how the chemicals are managed, and how they will affect the character and nature of the discharge.
2. The permits should mandate the testing of chemicals not listed in WQS but are listed in MSDS that could cause animal and human health risks. The permits need to be reflective of the dangerous chemicals used in fracking and not just rely on current standards to protect water quality.
3. The permits need to strengthen the monitoring requirements. The permits should require that monitoring samples be collected after bi-monthly well maintenance and fracking events. Monitoring requirements should be tied to chemical events happening at the facility and not whenever the facility wants to sample. The permits should also require that Toxics Pollutant Screen monitoring to occur more than every two years and WET monitoring to occur more than yearly.

Unless these Wind River permits can become more encompassing and achieve their intended goals as NPDES permits, they should be rejected. The EPA has been charged with protecting both water quality and public health, but has ignored that charge with these permits.

Respectfully submitted,

Linda A. Benson